

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**GENERAL MOTORS LLC,**

Plaintiff,

*~ against ~*

**THE PARTNERSHIPS *and*  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE “A”,**

Defendants,

**Case No.: 1 : 23 -cv- 03171**

**Judge:** The Honorable Mary M. Rowland

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**AFFIDAVIT IN SUPPORT OF  
THE GREEN MARKET  
MOTION TO VACATE DEFAULT JUDGMENT**

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Baruch S. Gottesman, Esq.  
GOTTESMAN LEGAL PLLC  
11 Broadway, Suite 615  
New York, NY 10004  
Phone: (212) 401-6910  
[bg@gottesmanlegal.com](mailto:bg@gottesmanlegal.com)  
*Counsel for “The Green Market”*

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**GENERAL MOTORS LLC,**

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**BARUCH S GOTTESMAN, ESQ.**, an attorney admitted to the roster of Attorneys of this Court, hereby respectfully affirms the truth of the following under the penalty of perjury:

1. I am the attorney for the “The Green Market” and am fully familiar with the facts and circumstances that I describe below.
2. This affirmation is submitted in further support Electrician Guy’s Motion to Vacate the Entry of Default and Default Judgment and for other Relief.

3. We respectfully submit this supplementary material in support of the Motion. Each of the Exhibits below are complete, true and accurate copies of their original.

<b><u>Exhibit</u></b>	<b><u>Document</u></b>	<b><u>Role in this Motion</u></b>
<b>Exhibit A</b>	Docket in <u>General Motors LLC v. The Partnerships, et al.</u> , 1:23-cv-3171 (N.D. Ill.)	Docket in this case showing lack of service of the Judgment and the docket entries that remain under Seal.
<b>Exhibit B</b>	Docket in <u>Purple Innovation v. Chuang Fan Handicraft, et al.</u> , 2:22-cv-00620 (D.Utah)	Illustrating how straightforward it is for Plaintiff's to comply with the individual Summons requirement under Rule 4(b) by showing example from recent case with similar posture.
<b>Exhibit C</b>	Screenshots from chinafirewalltest.com	Illustrating how courtlistener.com and dropbox.com are inaccessible in China
<b>Exhibit D</b>	Order in <u>Mwami v. U.S., et al.</u> , 1:99-cv-125 (D.D.C.)	Alternate Service on Osama bin Laden that required six publications with translation into local language
<b>Exhibit E</b>	Order in <u>Langford v. Juárez Cartel, et al.</u> , 1:20-cv-132 (D.N.D.)	Alternate Service on Juárez Cartel that required six publications with translation into local language
<b>Exhibit F</b>	Proof of Service in <u>Purple Innovation v. Chuang Fan Handicraft, et al.</u> , 2:22-cv-00620 (D.Utah)	Showing a sample of a Plaintiff providing Proof of Service of six attempts on each Defendant with Summons for each individual Summons as required under Rule 4(b) and related rules.
<b>Exhibit G</b>	Brief of Amici Curiae in <u>Palace Skateboards Grp. v. Aimeey, et al.</u> , 1:21-cv-05860 (S.D.N.Y.)	Amici brief by Professor Professor Benjamin L. Liebman of Columbia Law School's Hong Yen Chang Center for Chinese Legal Studies showing e-mail service not possible under Hague Convention and Chinese law.

4. For the reasons explained fully in the accompanying Memorandum of Law, the Defendant respectfully submits that the Entry of Default and Default Judgment should be vacated, and The Green Market's time to respond to the Complaint should be extended to a date provided by the Court.

DATED: **SEPTEMBER 13, 2023**

RESPECTFULLY SUBMITTED,

By:



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Baruch S. Gottesman, Esq.  
GOTTESMAN LEGAL PLLC  
11 Broadway, Suite 615  
New York, NY 10004  
Phone: (212) 401-6910  
[bg@gottesmanlegal.com](mailto:bg@gottesmanlegal.com)  
*Counsel for The Green Market*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 13, 2023, simultaneous with the filing of this Submission, a copy of this submission was served upon counsel for all Appearing Parties using the court's CM/ECF system which will provide a notice of electronic filing to the following counsel of record of consent in writing to accept this notice of service of this document by electronic means:

**Amy Crout Ziegler, Esq.**

**Jake Michael Christensen, Esq.**

**Rachel S. Miller, Esq.**

**Justin R. Gaudio, Esq.**

GREER, BURNS & CRAIN, LTD.

300 S. Wacker Dr., Suite 2500

Chicago, IL 60606

Phone: (312) 987-2926

Email: [Aziegler@gbc.Law](mailto:Aziegler@gbc.Law)

[Jchristensen@gbc.Law](mailto:Jchristensen@gbc.Law)

[Rmiller@gbc.Law](mailto:Rmiller@gbc.Law)

[Jgaudio@gbc.Law](mailto:Jgaudio@gbc.Law)

*Counsel for Plaintiff General Motors LLC*